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State of Nevada ex rel. Department of
Child and Family Services

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

D.O. JANE DOE, an individual;
K.Y. JANE DOE, an individual;
L.O. JANE DOE, an individual;
L.O.J. JOHN DOE, an individual;
P.K. JANE DOE, an individual,

Plaintiffs,

vs.

STATE OF NEVADA, EX. REL., DEPT OF
HEALTH & HUM. SERVS. DIV. OF CHILD
AND FAMILY SERVS, a public entity of the
State of Nevada; STACEY SILVERSTEIN, an
individual;

Defendants.

Case No. 2:23-cv-01929-APG-MDC

**JOINT STIPULATION TO DISMISS
DEFENDANTS THE STATE OF
NEVADA EX REL. THE
DEPARTMENT OF CHILD AND
FAMILY SERVICES**

Plaintiffs P.K. Jane Doe, D.O. Jane Doe, L.O. Jane Doe, L.O.J. John Doe, and K.Y. Jane Doe, by and through their attorneys of record, Andre M. Lagomarsino, Esq., Cory M. Ford, Esq., of Lagomarsino Law, and Defendants the State of Nevada ex rel. the Department of Child and Family Services (DCFS), by and through their respective counsels, have conferred and hereby stipulate pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure to dismiss Defendants DCFS from case 2:23-cv-01929 without prejudice. Parties agree and understand that if Plaintiffs later discover that DCFS may have liability based on any legally cognizable theory, Plaintiffs can seek to amend the Complaint, and any amendment would relate back to the original filing date of this lawsuit, including for purposes of the

statute of limitations. Parties also agree that DCFS does not agree to or concede any liability, and that no defenses or objections, including a defense regarding the statute of limitations, are waived by DCFS as a result of this Stipulation and any subsequent amendment.

Each party bearing their own attorney fees and costs.

IT IS SO STIPULATED.

DATED this 23rd day of January 2024.

DATED this 23rd day of January 2024.

/s/ Cory M. Ford

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/s/ Isaac Rowe

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and K.Y. Jane Doe*

*Attorneys for Defendant State of Nevada ex
rel. the Department of Child and Family
Services*

ORDER

Defendants DCFS are hereby DISMISSED WITHOUT PREJUDICE from Case 2:23-cv-01929.

IT IS SO ORDERED:

Dated: January 24, 2024


ANDREW P. GORDON
UNITED STATES DISTRICT JUDGE